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**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA**

F.M., *et al.*, individuals,
Plaintiffs,

vs.

UNITED STATES OF AMERICA,
METROPOLITAN INTERPRETERS
and TRANSLATORS, INC., a
corporation, *et al.*,
Defendants.

CASE NOS.: 12cv460-JM (MDD)
13cv1891-JM (MDD)
13cv1892-JM (MDD)

PLAINTIFFS' EXHIBIT LIST

No.	Date Marked	Date Admitted	Description
1			29 U.S.C. § 2002
2	4/9/2015	4/9/2015	Email from Joseph Citrano to Blanca Armenta, Monica Leu, Claudia Gonzalez, Ron Perez, Lee Laimbeer, Dan Grote, Marco Cruz, Charles Clements dated January 4, 2011 re: random polygraphs to be administered in San Diego Field Division (METRO001137)
3			Email from Lee Laimbeer to Joseph Citrano dated January 5, 2011 (METRO001482-1483)
4			Email from Lee Laimbeer to Joseph Citrano dated January 5, 2011 re polygraph test letter to new applicants (METRO001484-1485)
5			Email thread between Lee Laimbeer and Joseph Citrano dated July 1, 2011 (METRO001505-1506)
6	4/15/2015	4/15/2015	E-mail from Joseph Citrano to Monica Leu dated July 7, 2011 re: Metro employees without DEA access are considered unemployed (METRO001111-1112)
7	4/9/2015	4/9/2015	E-mail communication from Joseph Citrano to Monica Leu and Charles Clements dated July 13, 2011,

			including attachment to e-mail , re: his responses to concerns by Carlsbad monitors (METRO001507-1511).
8			E-mail from Maria Castro to Monica Leu dated July 14, 2011 re: dissemination of Metro's responses to concerns by Carlsbad monitors (METRO001222-1224)
9			E-mail communication from Blanca Armenta to Monica Leu dated July 15, 2011 re: Metro's responses to Carlsbad monitors read aloud during briefing (METRO001219 – 1221)
10	4/7/2015	4/7/2015	E-mail from Monica Leu to Blanca Armenta dated July 19, 2011 containing two attachments: Metro memorandum re: DEA polygraphs and Dept. of Labor info re: EPPA (METRO001532-1535)
11			E-mail communication thread among Lee Laimbeer, Blanca Armenta, and Ron Perez dated July 20, 2011, including attachments, <i>e.g.</i> "How to Prepare for a Security Clearance Polygraph Examination" (METRO001536-1539)
12			E-mail communication thread among Lee Laimbeer, Blanca Armenta, and Ron Perez dated July 20, 2011

			(METRO001540-1548)
13	4/9/2015	4/9/2015	E-mail communication from Joseph Citrano to Charles Clements, Dan Grote, Monica Leu, and Marco Cruz dated July 20, 2011 re: Rich Rios (DEA) e-mail that other agency security clearances not affected by DEA polygraphs (METRO001552-1554)
14	4/9/2015	4/9/2015	E-mail from Marco Cruz to Joseph Citrano, Dan Grote, Charles Clements, Lee Laimbeer et al., dated August 4, 2011, stating that a monitor's clearance with another federal agency does not affect that person's clearance with ICE (METRO001403)
15			E-mail from Lee Laimbeer to Blanca Armenta and Claudia Gonzalez dated August 5, 2011 re: YouTube video link (METRO001599).
16	4/13/2015	4/13/2015	Transcript of "The Truth About the Polygraph"
17			E-mail communications among Joseph Citrano, Lee Laimbeer, and Sondra Hester re: Francisco Bates email (METRO001103-1105)
18			E-mail from Joseph Citrano to
18a	4/7/2015	4/7/2015	Francisco Bates dated September 8,

18b	4/7/2015	4/7/2015	2011, including Dept. of Labor
18c	4/7/2015	4/7/2015	attachment re: EPPA (METRO001106-1110)
19			E-mail communication thread among Blanca Armenta, Monica Leu et al. regarding e-mail addressing polygraphs disseminated to Carlsbad monitors, dated September 8, 2011 (METRO001320-1323)
20			E-mail communications between Joseph Citrano and Lee Laimbeer, dated September 19, 2011, regarding polygraph memo (METRO001719- 1721)
21			E-mail communication between Lee
21(1727)	4/8/2015	4/8/2015	Laimbeer and Joseph Citrano
21(1728)	4/8/2015	4/8/2015	regarding corrections to letter to
21(1726)	4/9/2015	4/9/2015	Maria Nielsen (“Isn’t that backwards”), dated September 19, 2011 (METRO001726-1728)
22			E-mail communications between Joseph Citrano and Lee Laimbeer, dated September 19, 2011, regarding polygraph memo (METRO001729- 1732)
23			E-mail from Joseph Citrano to Maria Nielsen dated September 19, 2011 with letter attachment (METRO001733-1735)

24	4/9/2015	4/9/2015	E-mail from Joseph Citrano to Charlies Clements dated September 19, 2011 including attachment from Maria Nielsen (METRO001148-1150)
25 25(1821)	4/9/2015	4/9/2015	E-mail from Lee Laimbeer to Joseph Citrano dated February 28, 2011, regarding e-mail from Charlie Clements to “run it by Rebecca” (METRO001821-1824)
26			2007 contract between USA and Metropolitan (USA-00001 – 00057)
27			Chart of Metropolitan Management Structure (METRO002750)
28			Joseph Citrano Personal Financial Statement (METRO003335)
29	4/23/2015	4/23/2015	Metropolitan Interpreters & Translators, Inc. Balance Sheet (METRO003386)
30	4/23/2015	4/23/2015	Metropolitan Interpreters & Translators, Inc. Statement of Operations (METRO003387)
31	4/23/2015	4/23/2015	Metropolitan Interpreters & Translators, Inc. Operating Expenses (METRO003388)
32	32-1 4/23/2015	32-1 4/23/2015	Metropolitan Interpreters and Translators, Inc. 2013 tax return (Bates nos. METRO003336 – METRO003385)

33			E-mail from Claudia Gonzalez to Ronald Perez and Monica Leu dated August 9, 2011 (METRO001604)
34			E-mail thread among Monica Leu, Charles Clements, Ron Perez, Claudia Gonzalez disclosing employees in El Centro who failed polygraph (METRO001615-1617)
35			E-mail from Joseph Citrano to Lee Laimbeer and Dan Grote dated November 23, 2011 (METRO001125-1126)
36			E-mail from Marco Cruz to Ron Perez dated December 15, 2011 (METRO001774-1775)
37 37(1802)	4/9/2015	4/9/2015	E-mails between Marco Cruz and Joseph Citrano dated July 20, 2011 (METRO001802-1803)
38	4/9/2015		E-mail from Monica Leu to Maria "Lupita" Castro, dated August 23, 2011 (METRO001414-1415)
39	4/9/2015	4/9/2015	E-mail from Marco Cruz to Daniel Del Castillo disclosing identities of monitors who had failed the DEA administered polygraphs, dated November 29, 2011 (METRO001187)
40			E-mail communication thread between Marco Cruz and Daniel Del

			Castillo (METRO001238-1240)
41			E-mail communication thread between Marco Cruz and Daniel Del Castillo (METRO001241-1244)
42			Email thread among Lee Laimbeer, Marco Cruz, and Ron Perez (METRO001786-1787)
43			Email thread among Lee Laimbeer, Marco Cruz, and Ron Perez (METRO001788-1790)
44			Email thread among Lee Laimbeer, Marco Cruz, and Ron Perez (METRO001791-1793)
45 45(2007) 45(2008)	4/9/2015 4/9/2015	4/9/2015 4/9/2015	E-mail communication thread with Joseph Citrano dated March 19, 2012 re: notifying ICE of Eduardo Ruvalcaba's polygraph results (METRO002007 – 2009)
46			E-mail communication thread with Joseph Citrano dated March 19, 2012 (METRO002010 – 2011)
47			E-mail communication among Marco Cruz, Joseph Citrano, Dan Grote, Lee Laimbeer et al. dated March 19, 2012 (METRO002018 – 2019)
48	4/9/2015	4/9/2015	E-mail communication from Joe Citrano to Justice Parker dated January 12, 2012 re: disqualification letters (METRO001431-1432)

49	4/9/2015	4/9/2015	Memo from Joseph Citrano dated February 9, 2009 re: "Solicitation of Resumes and Letters of Commitment"
50	4/9/2015	4/9/2015	Memo from Joseph Citrano dated December 8, 2009 re: signing a commitment letter for Metropolitan
51	4/9/2015	4/9/2015	Commitment letter for Metropolitan
52			Letter from Metropolitan to Melany Duran re: termination of ICE security clearance dated 12/21/2011 (METRO003079)
53			E-mail authorizing ICE clearance for Melany Duran (METRO003080)
54			DEA letter to Joseph Citrano regarding disqualification of Melany Duran (METRO003081)
55			Letter from Lee Laimbeer to Melany Duran re: DEA disqualification letter (METRO003082)
56			Letter from Lee Laimbeer to Elizabeth Sanchez re: DEA disqualification letter (METRO002807)
57			Letter from Lee Laimbeer to Elizabeth Sanchez re: termination of ICE security clearance dated 12/21/2011 (METRO002808)
58			Letter to Joseph Citrano from DEA

			dated February 17, 2012 re: disqualification of Elizabeth Sanchez (METRO002809)
59			Letter to Joseph Citrano from DEA dated January 11, 2012 re: disqualification of Elizabeth Sanchez (METRO002810)
60			Email from Ron Perez re: Elizabeth Sanchez failed polygraph (METRO002811)
61			Letter to Joseph Citrano from DEA dated January 11, 2012 re: disqualification of Richard Gonzalez (METRO000901)
62			Letter from Lee Laimbeer to Richard Gonzalez re: termination of ICE security clearance dated 12/21/2011 (METRO000903)
63			Nondisclosure agreement between Richard Gonzalez and ICE/DHS (METRO000928-929)
64			DEA memo to William Sherman, Acting Special Agent in Charge, recommending Richard Gonzalez for Certificate of Appreciation Award (METRO000938-939)
65			Richard Gonzalez release from active duty Navy (METRO000950)

66	4/7/2015	4/7/2015	Letter to Joseph Citrano from DEA dated January 11, 2012 re: disqualification of Francisco Bates (METRO000204)
67	4/7/2015	4/7/2015	Letter from Lee Laimbeer to Francisco Bates re: DEA disqualification letter
68			Letter from Ron Perez on behalf of Francisco Bates dated February 26, 2010 (METRO000244)
69			Letter from Lee Laimbeer to Lilia Palomino re: DEA disqualification letter (METRO002899)
70			Letter to Joseph Citrano from DEA dated February 17, 2012 re: disqualification of Lilia Palomino (METRO002900)
71			Letter to Joseph Citrano from DEA dated January 11, 2012 re: disqualification of Lilia Palomino (METRO002901)
72			Letter to Joseph Citrano from DEA dated February 17, 2012 re: disqualification of Maribel Taylor (METRO002980)
73			Letter from Lee Laimbeer to Maribel Taylor re: DEA disqualification letter (METRO002979)

74	4/13/2015	4/13/2015	Letter from Lee Laimbeer to Maribel Taylor re: termination of ICE security clearance dated 12/21/2011 (METRO002981)
75	4/8/2015	4/8/2015	Letter from Lee Laimbeer to Adoption Options, Inc. re: Maria Nielsen's employment dated September 21, 2009 (METRO000836)
76			Letter from Lee Laimbeer to Adoption Options, Inc. re: Maria Nielsen's employment dated September 28, 2009 (METRO000837)
77			Letter from Kathleen Purdy to Adoption Options, Inc. re: Maria Nielsen dated January 14, 2010 (METRO000827)
78			Letter to Joseph Citrano re: DEA disqualification for Maria Nielsen dated January 11, 2010 (METRO000828)
79			Letter from Joseph Citrano to Maria Nielsen re: polygraph and EPPA (METRO000847-0848)
80-1			Photo of Maria Nielsen and family
80-2			Photo of Maria Nielsen and family
80-3			Photo of Maria Nielsen and family
80-4			Photo of Maria Nielsen and family

1	80-5			Photo of Maria Nielsen and family
2	80-6			Photo of Maria Nielsen and family
3	80-7			Photo of Maria Nielsen and family
4	80-8			Photo of Maria Nielsen and family
5	80-9			Photo of Maria Nielsen and family
6	80-10			Photo of Maria Nielsen and family
7	80-11			Photo of Maria Nielsen and family
8	80-12			Photo of Maria Nielsen and family
9	80-13			Photo of Maria Nielsen and family
10	80-14			Photo of Maria Nielsen and family
11	80-15			Photo of Maria Nielsen and family
12	80-16			Photo of Maria Nielsen and family
13	80-17			Photo of Maria Nielsen and family
14	80-18			Photo of Maria Nielsen and family
15	80-19	4/8/2015	4/8/2015	Photo of Maria Nielsen and family
16	80-20			Photo of Maria Nielsen and family
17	80-21			Photo of Maria Nielsen and family
18	80-22			Photo of Maria Nielsen and family
19	80-23			Photo of Maria Nielsen and family
20	80-24			Photo of Maria Nielsen and family
21	80-25			Photo of Maria Nielsen and family
22	80-26			Photo of Maria Nielsen and family
23	80-27			Photo of Maria Nielsen and family
24	80-28			Photo of Maria Nielsen and family
25	80-29			Photo of Maria Nielsen and family
26	80-30			Photo of Maria Nielsen and family
27	80-31			Photo of Maria Nielsen and family
28	81			Photo of Melany Duran and son

82			Photo of Melany Duran and son
83			Photo of Melany Duran and son
84			Photo of Melany Duran and son
85			Photo of Eduardo Ruvalcaba and family
86			Photo of Eduardo Ruvalcaba and family
87			Photo of Elizabeth Sanchez and family
88			Photo of Elizabeth Sanchez and family
89			Photo of Francisco Bates and family
90			Photo of Francisco Bates and family
91			Photo of Francisco Bates and family
92			Photo of Fernando Medina and family
93			Photo of Fernando Medina and family
94			Photo of Lilia Palomino with family
95			Photo of Maribel Taylor and family
96			Photo of Maribel Taylor and family
97	4/14/2015	4/14/2015	Photo of Richard Gonzalez's DEA plaque
98			Photo of State Dept. gift to Richard Gonzalez
99			Photo of Richard Gonzalez
100			Photo of Richard Gonzalez
101			Photo of Richard Gonzalez's family

102-1			Photo of Richard Gonzalez with family and friends
102-2			Photo of Richard Gonzalez with family and friends
102-3			Photo of Richard Gonzalez with family and friends
102-4			Photo of Richard Gonzalez with family and friends
102-5			Photo of Richard Gonzalez with family and friends
102-6			Photo of Richard Gonzalez with family and friends
102-7			Photo of Richard Gonzalez with family and friends
103 ¹			Summary of Richard Gonzalez's economic damages
104			Summary of Maria Nielsen's economic damages
105	4/7/2015		Summary of Francisco Bates' economic damages
106			Summary of Fernando Medina's economic damages
107			Summary of Eduardo Ruvalcaba's economic damages
108	4/10/2015		Summary of Melany Duran's economic damages

¹ Plaintiffs' exhibits 103 through 111 (summary of each plaintiff's economic damages) is subject to revision and modification with updated information.

109			Summary of Elizabeth Sanchez's economic damages
110			Summary of Lilia Palomino's economic damages
111			Summary of Maribel Taylor's economic damages
112			Marco Cruz e-mail (METRO 1198-1199)
113	4/9/2015	4/9/2015	Email from Joseph Citrano regarding Melany Duran (METRO 1498) (defense exhibit 580 & 581)
114	4/9/2015	4/9/2015	Email from Joseph Citrano regarding Fernando Medina (METRO 1113) (defense exhibit 596)
115	4/9/2015		Information about Metropolitan from www.metlang.com
116			Document from www.metlang.com regarding hourly wage for DEA monitor/linguist
117			Document from www.metlang.com regarding hourly wage for ICE monitor/linguist
118			Language of Employee Polygraph Protection Act (entire statute)
119			Email that Fernando Medina did not pass the 119 polygraph (METRO 1225) (defense exhibit 861)
120			Email that Francisco Bates did not

			pass the polygraph (METRO 1330)
121			Email that Maria Nielsen declined to take the polygraph (METRO 1347) (defense exhibit 707)
122			Email that Richard Gonzalez declined to take polygraph (METRO 1290-1291) (defense exhibit 722)
123			Email that Eduardo Ruvalcaba failed polygraph (METRO 2003)
124			Email that Lilia Palomino failed polygraph (METRO 1612-1613) (defense exhibit 641)
125			Email that Melany Duran failed polygraph (METRO 1988) (defense exhibit 580 & 581)
126	4/13/015	4/13/2015	Email from Claudia Gonzalez to Maribel Taylor dated August 7, 2011 (Bates no. PLAINTIFF M.T. 1).
127	4/14/2015	4/14/2015	Photo of Plaintiff Melany Duran
128	4/14/2015	4/14/2015	Photo of Plaintiff Richard Gonzalez
129	4/14/2015	4/14/2015	Photo of Plaintiff Fernando Medina
130	4/14/2015	4/14/2015	Photo of Plaintiff Eduardo Ruvalcaba
131	4/14/2015	4/14/2015	Photo of Plaintiff Maribel Taylor
132	4/14/2015	4/14/2015	Photo of Plaintiff Francisco Bates
133	4/14/2015	4/14/2015	Photo of Plaintiff Elizabeth Sanchez
134	4/14/2015	4/14/2015	Photo of Plaintiff Lilia Palomino
135	4/14/2015	4/14/2015	Photo of Plaintiff Maria Nielsen

136	4/14/2015	4/14/2015	Defense exhibit 894-1 (redacted) (Bates no. METRO003334)
137	4/16/2015		Invoice
138	4/16/2015		2 nd Invoice
139	139-1 4/23/2015 139-2 4/23/2015 139-3 4/23/2015	139-1 4/23/2015 139-2 4/23/2015 139-3 4/23/2015	Metropolitan Interpreters & Translators, Inc. Balance Sheets December 31, 2014 and 2013
140	140-1 4/23/2015 140-2 4/23/2015 140-3 4/23/2015	140-1 4/23/2015 140-2 4/23/2015 140-3 4/23/2015	Metlang, LLC Statement of Operations and Member's Deficit for the year ended December 31, 2014 and 2013
141	141-1 4/23/2015	141-1 4/23/2015	Metlang, LLC 2013 tax return

DATED April 8, 2015

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